HIGHWAYS — USE OF AUTOMOBILES — NEGLIGENCE IN OPERATING AUTOMOBILE. — MCINTYRE v. ORNER, 76 N. E. 750 (IND.). *Held,* it was negligence for an autoist to drive his automobile at the rate of more than 15 miles an hour toward a team of horses which were frightened at the machine, where the autoist saw or could have seen, when 300 feet away, that the horses were frightened.

The case above is a very interesting one from many standpoints, the chief of which is from that of its being seasonable. Questions are bound to arise in great numbers due to the increasing use of this method of locomotion, totally unknown a short time ago. So that any well decided point cannot fail to be of use as a precedent and aid in settling these questions in the future. At present it is difficult to find many cases of this kind reported. There being no question of the right of an automobile to the use of the highway, it becomes a question of what kind of a use. It is obvious that it must as in all other cases be a proper use. As to use of vehicles in general see *Payne v. Smith,* 4 Dana 497; *Angell on Highways* p. 441 *et post.* The law of the road will not tolerate any inconsiderate and reckless disregard of the rights of other travelers on the highway. *Railway v. Long,* 112 Ind. 166; *Benjamin v. Holyoke R. Co.,* 160 Mass. 3. Parties owe to each other the duty of reasonable care. *Baker v. Fehr,* 97 Pa. 70. In the case of the auto it does not seem that the defendant used this care. It was not prudent driving. In the case of *Mason et al., v. West,* 70 N. Y. (Sup.) 478, it was held that a verdict for damages to the Plaintiff was justified from the evidence. The evidence was that the auto gave out a loud puffing sound and was running at the speed of 10 or 12 miles an hour and did not slacken until the horses became frightened.

MARRIAGE — VALIDITY. — CHAMBERLAIN v. CHAMBERLAIN, 62 ATL. 680. (N. J.). *Held,* that when a man and woman marry but the marriage is subsequently shown to be illegal by the existence of the wife's former husband, when she subsequently obtains a decree of divorce from the former husband and it is shown that they still believe themselves married, their relations are lawful.

Where one of the parties to a valid marriage contracts a second marriage, the second and bigamous marriage is not rendered valid by a subsequent decree of divorce dissolving the prior marriage. *Teter v. Teter,* 101 Ind. 129; *Hunts' Appeal,* 86 Pa. St. 294, as the decree becomes operative only when rendered. *Estate of Cook,* 77 Cal. 220; *Alt v. Banholzer,* 39 Minn. 511. But where the relation was begun under a contract of marriage supposed to be legal, though in fact void, in consequence of the disability of one of the parties, yet after removal of the disability a subsequent marriage may be presumed from acts of recognition of each other as husband and wife, and from continued matrimonial cohabitation and general reputation. *Collins v. Collins,* 80 N. Y. 9; *Blanchard v. Lambert,* 43 Iowa 228. Without the proof of the subsequent actual marriage such marriage will not be presumed from continued cohabitation and reputation of a relation between them which was of illicit origin. *App. of Reading Ins. Co.,* 113 Pa. St. 204.

MUNICIPAL ORDINANCES — WAGES OF LABORERS — CONSTITUTIONALITY. — GIES v. BROAD, 83 PAC. 1025 (WASH.). *Held,* that a municipal ordinance